



Roberson and Associates, LLC
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July 26, 2017

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Written *ex parte* presentation in IB Docket Nos. 11-109 and 12-340; IBFS File Nos. SES-MOD-20151231-00981, SAT-MOD-20151231-00090, and SAT-MOD-20151231-00091

Dear Ms. Dortch:

I write in response to a written *ex parte* filing by the GPS Innovation Alliance dated July 13, 2017 ("GPSIA Letter"), which purports to address "the appropriate standard for evaluating harmful interference to Global Navigation Satellite System ('GNSS') devices." (GPSIA Letter p. 1.) Although I do not agree with much of the GPSIA Letter's analysis or its conclusion regarding "the most appropriate metric for assessing the impact on GPS," the Commission need not address those issues since the GPSIA Letter acknowledges the most important fact: GPSIA's members John Deere, Garmin, Trimble, and TopCon stated they do not oppose Ligado's applications with respect to the right-hand spectrum so long as Ligado operates within the requested technical parameters. *Id.* at 2-3.

The filing, however, reveals a logical conclusion that cannot go unnoticed. Because the above-mentioned GPSIA members do not oppose Commission approval of Ligado's applications, these parties evidently concluded that Ligado can operate in a manner that does not cause harmful interference to their devices. That inexorably leads to the conclusion that Ligado's proposal satisfies the "1 dB standard" with respect to their devices. I suppose that one could reach another conclusion, namely that those same GPS companies have determined that 1 dB is not the appropriate standard. Thankfully, the Commission need not determine whether it is the former or the latter. The ultimate conclusion of the GPS companies provides ample support to rule favorably on the Ligado spectrum proposal.

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Please let me know if there are any questions.

Sincerely,

Dennis Roberson

cc: Rachael Bender
Erin McGrath
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